

Atty. Dkt. No. 00CR002/KE

**REMARKS**

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. No claims are currently being amended.

This amendment does not add, change and/or delete claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Claims 1-20 remain pending in this application.

As a preliminary matter, Claims 1-20 and not Claims 1-15 as noted by the Examiner in the Office Action remain pending. Claims 16-20 depend from independent Claim 15. As discussed in the previous response to Office Action, Claims 16-20 recite subject matter which is additionally patentable over the cited art. For example, Claims 19 and 20 describe a specific method for moving an image. The specific method is not shown, described or suggested in the art cited by the Examiner.

In paragraph 4 of the Office Action, Claims 1, 3, 5-8, 10, and 12-15 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,392,695 (Watamoto). The Examiner states:

... Watamoto teaches an image display device 500 ... associated with a method, the image display device 500 comprising:

- a. DVD generates a stationary image (a static image).
- b. Deterioration preventor 508 receives information from DVD 504 and TV 506 and generates control signals to each (col. 7, lines 39-41). ...
- d. A screen burn-in preventor 510 (fig. 5) functions as the image adjustment during reproduction of the CD according to

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above constitution is described (col. 6, lines 51-53). Thus, since the wide screen 16:9 aspect ratio picture being modified to full screen 4:3 aspect ratio picture which is too fast, so that viewers are unable to perceive.

Applicants respectfully traverse the rejection.

In particular, Applicants traverse the Examiner's statements with respect to the operation of burn-in preventor 510 of Watamoto. The sections cited by the Examiner do not discuss the moving of an image so that the movement is imperceptible to a user. This limitation is specifically recited in independent claims 1, 8, and 15. Watamoto merely mentions that the on screen menu (OSC) is moved. (See Figure 3). The sections of Watamoto cited by the Examiner merely state that the screen burn-in is prevented by providing image adjustment. There is no indication that the image adjustment occurs at a speed that is imperceptible to the user. Accordingly, it is respectfully submitted that independent Claim 1 and its dependent Claims 2-7, independent Claim 8 and its dependent Claims 9-14, and independent Claim 15, and its dependent claims 16-20 are patentable over Watamoto because Watamoto does not show each and every limitation in independent claims 1, 8 and 15.

In paragraphs 12 and 13, Claims 2 and 9 are rejected under 35 U.S.C. § 103 as being unpatentable over Watamoto in view of U.S. Patent No. 5,900,851 (Toffolo). The Examiner states:

Watamoto et al. teaches all of the claimed invention . . . , except for the matrix of light emitting diodes. However, Toffolo et al. teaches electroluminescent display panel 22 (fig. 1) which inherent includes the matrix of light emitting diodes. It would have been obvious to one of ordinary skill in the art at the time the invention to provide electroluminescent display panel 22 which inherent includes the matrix of light emitting diodes taught by Toffolo et al. for Watamoto et al.'s display device, because this would prevent screen burn in as taught by Toffolo . . .

Applicants respectfully traverse the rejection.

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Neither Watamoto nor Toffolo suggest moving an image so that it is imperceptible to the user. As discussed above, Watamoto does not move an image so that it is imperceptible to the user. Toffolo does not provide for deficiencies of Watamoto. It is respectfully submitted that dependent Claims 2 and 9 are patentable over Watamoto and Toffolo.

In paragraphs 15 and 16, Claims 4 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Watamoto in view of U.S. Patent No. 6,369,851 (Marflak). As discussed above, Watamoto does not move an image so that it is imperceptible to the user. Marflak fails from a similar deficiency, instead relying on an edge modification generator. It is respectfully submitted that claims 4 and 11 are patentable over Watamoto and Martak.

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

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The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 18-1722. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 18-1722.

Respectfully submitted,

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